

Columbus, Georgia market.

6. JRN employs an Area Manager who oversees the operation of all restaurants within the Columbus, Georgia market. Since the restaurants were purchased in December 2007, Glenn Barnes has been the Area Manager overseeing JRN restaurant operations in the Columbus, Georgia market.

7. As Human Resources Director, I am familiar with JRN's hiring practices at its restaurants.

8. Within each individual restaurant, JRN employs both Restaurant General Managers ("RGM") and Assistant Unit Managers ("AUM") to manage the individual restaurant's operations.

9. AUMs at JRN interview new non-managerial employees ("Team Members").

10. In the Columbus, Georgia market, Mr. Barnes performs a final interview with all new Team Members in the Columbus, Georgia market.

11. Mr. Barnes' practice of performing a final interview with all new Team Members is unique to his market.

12. Other than Glenn Barnes, I am not aware of any other Area Managers who interview new Team Members.

13. AUMs sign and certify I-9 paperwork for new Team Members as an authorized representative of JRN. For example, see Exhibit 1 signed by Plaintiff Angela Horace.

14. AUMs complete Daily Sales Reports. For example, see Exhibit 2 prepared by Plaintiff Veronica Deloney.

15. AUMs complete and verify the information found in the Financial Cash Controls Report. For example, see Exhibit 3 prepared by Brenda Dukes.

16. AUMs have the ability to delete entries from the point of sale system and authorize customer giveaways. See Exhibit 4, reflecting deletions and giveaways by Brenda Dukes on the Shift Accountability Trend Report.

17. AUMs complete Manager Shift Reports. For example, see Exhibit 5 signed by Plaintiff Kimiya Carter.

18. AUMs complete Physical Inventory Verification Statements, which confirm the restaurant's inventory and verify the amount of the restaurant's change fund. For example, see Exhibit 6 signed by Plaintiff Beternia Baker and Exhibit 7 signed by Plaintiff LaQuanda Jackson.

19. AUMs sign and submit Background Check Authorization and Release forms for new Team Members on behalf of JRN. For example, see Exhibit 8 signed by Plaintiff Samuel Jordan.

20. AUMs complete the Daily Food Standard Review to ensure that product quality and food standards are being followed. For example, see Exhibit 9 signed by Plaintiff Cheryl Miles and Exhibit 10 signed by Brenda Dukes.

21. AUMs also prepare To Do Lists for Team Members and assign each task a completion date. For example, see Exhibit 11 signed by Plaintiff Cheryl Miles.

22. AUMs issue disciplinary actions to Team Members, and have the authority to determine the appropriate level of discipline. For example, see Exhibit 12 signed by Plaintiff Kimiya Carter.

23. AUMs complete and submit Separation Reports to JRN's Payroll Department following a Team Member's termination. For example, see Exhibit 13 signed by Plaintiff Marilyn Nelson.

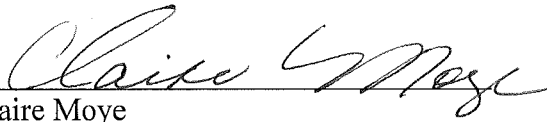
24. AUMs are responsible for reviewing JRN's policies and procedures with new

Team Members and obtaining new Team Members' signatures on JRN's acknowledgement forms. For example, see Exhibit 14 signed by Plaintiff Marilyn Nelson.

25. The documents attached hereto as Exhibits 1 through 14 were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of and a business duty to record or transmit those matters.

26. The documents attached hereto as Exhibits 1 through 14 are kept in the course of JRN's regularly-conducted activity and the making of the documents was a regular business practice of JRN.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing declaration is true and correct. Executed on this 24th day of March, 2016.



Claire Moyer